



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

MAR 03 1989

COPY

REPLY TO
ATTN OF: HW-112

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

✓ Richard D. Zweig
Chem-Security Systems, Inc.
Star Route
Arlington, Oregon 97812-9709

Dear Mr. Zweig:

This letter is in response to Chem-Security Systems, Inc. (CSSI) January 23, 1989, letter requesting revision of the May 22, 1987, as amended, Temporary PCB Disposal Approval, to include Cells 4 and 6 of Landfill L-13, because of a shortage in landfill capacity and a delayed issuance of the renewal of the PCB Letter of Approval. I have decided to revise the conditionally granted May 22, 1987, as amended, Temporary PCB Disposal Approval for disposal of PCB waste in Landfill L-13 to include Cells 4 and 6, as well as to require certain revisions of the existing PCB Letter of Approval for consistency with your RCRA Permit No. ORD089452353, concerning groundwater monitoring frequency, and leachate pumping from the PCB portion of trenches L-5, L-7, and L-9.

Part C, of the PCB Letter of Approval, is hereby amended, effective immediately as follows:

.
(24)(a) Observation wells shall be installed within the PCB portion of trenches at a site where the bottom of the PCB portion of the trench is at its lowest elevation. These observation wells shall extend to the bottom of the trench and shall be at least 4 inches in diameter and adequately perforated to collect fluids. (A leachate interceptor drain and collection system may be installed for the PCB disposal portion of Trench 5 and may be used in lieu of an observation well in this trench. The drain and system shall be adequate to collect liquids emanating from the PCB disposal portion of Trench 5.) The observation wells in the PCB disposal portion of trenches (and the leachate interceptor drain and collection system for Trench 5) shall be checked monthly for the presence of liquid. If liquid is found in these observation wells (or interceptor drain and collection system), all pumpable quantities of such liquid shall be removed, to the extent practicable, within 24 hours of the time such liquid is found.

A contemporaneous written record shall be kept of the liquid volume and date of removal. Any liquid removed from the wells (or interceptor drain and collection system) shall be stored pursuant to this approval for subsequent incineration unless tested and found to contain less than 500 ppm PCBs.

.

.

(25) The two groundwater monitor wells (site water well and the office water well) shall be sampled annually and analyzed for the following parameters:

- a. PCBs
- b. pH
- c. Specific Conductance
- d. Total Organic Halides

A written record of sampling and laboratory analysis results shall be maintained

.

Condition 1, of the Temporary PCB Disposal Approval, is hereby amended, effective immediately as follows:

.

(1) The disposal of PCBs, as defined by 40 CFR §761.2 (incorporated herein by reference), in Landfill L-13 shall be restricted to Cells 1 and 2, as depicted on Drawing No. 1 Project No. 233-07.00, and to Cells 4 and 6, as depicted on Sheet 3, Work Order No. 6435-S. PCB shall be disposed in Landfill L-13 in accordance with 40 CFR §761.60 and the following operational procedures/restrictions:

.

(b) Pursuant to §761.75(c)(3)(ii), in order to ensure that operations in Cells 1, 2, 4, and 6 of Landfill L-13 do not present an unreasonable risk of injury to health and environment from PCBs, the following requirements, to the extent they are applicable to operations in Cells 1, 2, 4, and 6 of Landfill L-13 must be met (for simplification purposes, the analogous RCRA regulatory language is referenced):

- i. Sections 265.13-265.17, 265.31-265.35, 265.37, 265.51-265.56, 265.111-265.120, 265.141-265.150, 265.302, 265.309, 265.310, 265.312, 265.313, 265.314(b), 265.314(c)(1), 265.314(c)(3), 265.314(d), 265.314(f), and 265.315 under Part 265--INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES. In complying with these sections CSSI shall read "hazardous wastes(s)" as "PCB(s)" whenever it appears.

(d) The groundwater monitoring program for Landfill L-13 shall be as designated in Exhibit 10 Sections 4, 5, 6, 7, and Appendix C of CSSI's RCRA Part B Permit Application, as last revised July 1987, and as amended by CSSI's Final RCRA Permit No. ORD089452353 Part IX (except to the extent that Part IX is pending final EPA action on CSSI's petition for appeal of portions of Part IX), with addition that Landfill L-13's groundwater monitoring system will also be sampled and analyzed for PCBs on an annual basis. To the extent CSSI is not following Part IX, awaiting final EPA action on CSSI's petition, Condition 1(b) above, shall also include reference to "Section 265.90-265.94". The first sampling event for these parameters must take place prior to placement of any PCBs in Landfill L-13. The results of these PCB analysis and water elevation levels should be submitted to EPA within 30 days of receipt by CSSI of analytical results from the laboratory, which is not to exceed 120 days of each sampling event. A written record of sampling and laboratory analysis results shall be maintained on-site. Sampling methods and analytical procedures for the parameter PCBs in Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, EPA Publication SW-46. In addition, any laboratory performing chemical tests for the operation of Landfill L-13 shall be a participant in EPA's Performance Evaluation Sample Program for analytical quality control.

. . . .

(l) The secondary leachate collection system shall operated in accordance with the procedures specified in "Response Action Plan for L-13, Cells 1 and 2" of CSSI's RCRA Part B Permit Application, as last revised April 1987, as amended by CSSI's Final RCRA Permit No. ORD089452353 Conditions VI.B.(7) through VI.B.(7)(f) and "Response Action Plan for L-13, Cells 4 and 6," of CSSI's RCRA Part B Permit Application, as last revised September 1987, as amended by CSSI's Final RCRA Permit No. ORD089452353 Conditions VI.B.(7) through VI.B.(7)(f).

(m) The leachate collection system for Landfill L-13's Cells 1, 2, 4, and 6 shall be checked for the presence of liquid at least once every business day. If any liquid is found in the leachate collection system, the system should be pumped to sustain the height of leachate at no ~~greater~~ greater than one foot.

A chronological record should be maintained on-site of the results of the checks on the leachate collection system and of any pumping activity, including leachate level prior to pumping, quantity of leachate pumped, and level of leachate after pumping.

. . . .

- (o) A. Disposal in Cells 1, 2, 4, and 6 of Landfill L-13 of RCRA wastes, RCRA/PCB waste mixtures and PCB wastes must be conducted so that it does not:

i. Generate extreme heat or pressure, fire or explosion, or violent reaction;

ii. Produce uncontrolled toxic mists, fumes, dust, gases in sufficient quantities to threaten human health;

iii. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

iv. Damage the structural integrity of the device or facility containing the waste, or

v. Through other like means threaten human health or the environment.

B. Disposal of RCRA wastes, RCRA/PCB waste mixtures and PCB wastes meeting the characteristic of ignitability as defined under 40 CFR §261.21 and which are in the form of a non-liquid as demonstrated by the absence of free liquids using Method 9095 (See Condition 1(c) for complete reference of method) are not precluded for land disposal by 40 CFR §761.75(b)(8)(iii) and are authorized for disposal in Cells 1, 2, 4 and 6 of Landfill L-13 when managed in accordance with the practices designated in §265.312 under Condition 1(b) above.

- (p) Approval of PCB disposal in Landfill L-13 Cells 1, 2, 4, and 6 shall continue until a final determination is issued by EPA (and effective) in response to CSSI's request for reissuance of this approval. The Regional Administrator may act at any time to extend, alter, amend, modify, suspend, or revoke this approval as he deems necessary or appropriate.

If EPA ultimately makes a determination not to reissue this approval, CSSI must immediately cease placement of PCB wastes in Landfill L-13 and must then either complete final closure on the portion of Landfill L-13 utilized for PCB disposal or must then remove all PCBs from Landfill L-13. If CSSI elects the closure option, it must place a 10 foot wide soil dike separating the portion of Landfill L-13 utilized for PCBs from the unused portion of the trench. The 10 foot wide dike would have to be certified to be structurally sound, and to have a permeability of no greater than 1×10^{-7} cm/sec. Supporting documentation for the certification must, at a minimum, include an as-built drawing.

5

construction procedures, stability analysis, compaction data and permeability data.

. . . .
All correspondence or inquiries on this matter should be directed to Catherine Massimino of my staff, at (206) 442-4153.

Sincerely,

Charles Findley
Charles E. Findley, Director
Hazardous Waste Division

cc: T. Virnig, CSSI
J. Whitworth, Department of Environmental Quality (DEQ)
P. Christiansen, DEQ